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## IN THE UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT

No. 23-4693

UNITED STATES OF AMERICA,

Plaintiff - Appellee,

 $\mathbf{v}$ .

ARBAB SALEEM,

Defendant - Appellant.

CONSENT MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF AND JOINT APPENDIX

Pursuant to the Federal Rules of Appellate Procedure, Arbab Saleem, respectfully requests this Court to extend the deadline to file the opening brief and joint appendix by 10 days, from February 21, 2024 to March 4, 2024. In support of this Motion, Mr. Saleem offers the following:

- 1. Counsel is court-appointed.
- 2. Counsel has not requested any previous extensions and will not request any more extensions.
- 3. Although Mr. Saleem is attempting to expedite this matter, he is currently incarcerated and is very difficult to get in touch with. The prison has strict rules regarding allowing inmates to speak with their attorneys and he is not currently able to email with counsel. Therefore, a brief extension is necessary to accommodate phone calls between counsel and client about the brief.
  - 4. The government consents to the relief requested in this Motion.

WHEREFORE, Mr. Saleem respectfully requests a 10-day extension of the deadline by which to file his opening brief and joint appendix, up to and including March 4, 2024.

Respectfully submitted, this 19th day of February, 2024.

/s/ William R. Terpening William R. Terpening N.C. Bar 36418

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Counsel for Arbab Saleem

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## **CERTIFICATE OF SERVICE**

I certify that I have filed this **CONSENT MOTION FOR EXTENSION OF TIME TO FILE OPENING BRIEF AND JOINT APPENDIX** through the Court's ECF system, which constitutes service on all parties.

Dated: February 19, 2024.

<u>/s/ William R. Terpening</u> William R. Terpening